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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	Case No. CR 14-00175 TEH
)	
Plaintiff,)	JOINT APPLICATION FOR PROTECTIVE
)	ORDER REGARDING CERTAIN PHMSA
v.)	MATERIALS; PROPOSED ORDER
)	
PACIFIC GAS AND ELECTRIC COMPANY,)	
)	
Defendant.)	

APPLICATION

The parties in the above-captioned case jointly submit this application for a Protective Order regarding the production of certain Pipeline and Hazardous Materials Safety Administration (PHMSA) materials as to which PHMSA asserts as confidential business information of other pipeline operators.

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JOINT APPLICATION FOR PROTECTIVE ORDER; [PROPOSED] ORDER
CR 14-00175 TEH

The parties agree and request that the Court order that PG&E and its counsel may use these materials only in connection with the defense of this criminal case. In the event that the defense finds it necessary to file copies of these materials, the parties agree and request that this Court order such filing to be made under seal.

SO STIPULATED.

Dated: March 14, 2016

BRIAN J. STRETCH
Acting United States Attorney

/s/

HALLIE M. HOFFMAN
Assistant United States Attorney

Dated: March 10, 2016

/s/

MARGARET A. TOUGH
KATE DYER
Counsel for Defendant PG&E

~~PROPOSED~~ ORDER

Based upon the above application, and for good cause appearing, IT IS HEREBY ORDERED that the production of certain Pipeline and Hazardous Materials Safety Administration (PHMSA) materials as to which PHMSA asserts as confidential business information of other pipeline operators shall be governed by this Protective Order. IT IS FURTHER ORDERED that PG&E and its counsel may use these materials only in connection with the defense of this criminal case. IT IS FURTHER ORDERED that, in the event the defense finds it necessary to file copies of these materials, such filing to be made under seal.

IT IS SO ORDERED.

Dated: March 15, 2016, 2016


HON. MARIA ELENA JAMES
United States Magistrate Judge